



## Nebraska Public Power District

*Always there when you need us*

Joe L. Citta, Jr.  
Corporate Environmental Mgr.  
PH: 402-563-5355

April 15, 2011

Mr. Brad Reid  
Air Quality Division  
Nebraska Department of Environmental Quality  
Suite 400, The Atrium  
1200 N Street  
Lincoln, NE 68509-8922

**Subject: Nebraska Public Power District, Gerald Gentleman Station, Units 1 & 2, Sutherland, NE  
Supplemental BART Assessment – Dry Sorbent Injection (DSI)  
Questions per April 8, 2011, E-mail**

Dear Brad:

This letter is in response to your questions contained in your e-mail dated April 8, 2011:

Regarding your first question, "I want to confirm that you used a baseline sulfur content of around 1.7 lb. – SO<sub>2</sub>/MMBtu?":

Yes, it was used as the baseline sulfur content for the coal used in the analysis. The 1.72 lbs. SO<sub>2</sub>/MMBtu was selected because it was also used as a baseline in the scrubber analysis contained in the 2008 BART Analysis that was submitted to the Nebraska Department of Environmental Quality.

In your e-mail dated January 28, 2011, you requested Nebraska Public Power District to perform a side-by-side analysis of DSI to scrubber technologies. Since the 1.72 lbs. SO<sub>2</sub>/MMBtu was utilized as a baseline in the scrubber analysis submitted in the 2008 BART Analysis, it was necessary to select the same baseline for the side-by-side DSI analysis.

Regarding your second question, "My question is regarding how you calculated the amount of Trona needed for each unit.":

Attached is the Calculation for Trona Ore Injection Rate provided by Sargent & Lundy explaining their calculation.

Please let me know if you have any additional questions.

Sincerely,

Joe L. Citta, Jr.  
Corporate Environmental Mgr.

Att.

cc: Mike Linder (NDEQ) w/att.  
Jay Ringenberg (NDEQ) w/att.  
Shelley Schneider (NDEQ) w/att.

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